

## EXHIBIT 316

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF OHIO  
3 EASTERN DIVISION

4 IN RE: NATIONAL )  
5 PRESCRIPTION ) MDL No. 2804  
6 OPIATE LITIGATION )  
7 \_\_\_\_\_ ) Case No.  
8 ) 1:17-MD-2804  
9 )  
10 THIS DOCUMENT RELATES ) Hon. Dan A.  
11 TO ALL CASES ) Polster  
12 )

13 FRIDAY, JANUARY 4, 2019

14 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
15 CONFIDENTIALITY REVIEW

16 - - -

17 Videotaped deposition of Ramona  
18 Sullins, held at the offices of JONES DAY, 77  
19 West Wacker Drive, Chicago, Illinois,  
20 commencing at 7:31 a.m., on the above date,  
21 before Carrie A. Campbell, Registered  
22 Diplomate Reporter, Certified Realtime  
23 Reporter, Illinois, California & Texas  
24 Certified Shorthand Reporter, Missouri &  
25 Kansas Certified Court Reporter.

- - -

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1 what Walmart's obligations were at that time?  
 2 MS. FUMERTON: Objection.  
 3 Form.  
 4 QUESTIONS BY MR. BOWER:  
 5 Q. Strike that.  
 6 Do you recall generally what  
 7 Walmart's obligations were at that time  
 8 regarding monitoring of orders for  
 9 Schedule II narcotics?  
 10 A. No, I don't.  
 11 Q. At some point did you become  
 12 aware of Walmart's obligations to monitor  
 13 orders for Schedule II narcotics?  
 14 A. I did.  
 15 Q. And when did you become aware  
 16 of that?  
 17 A. I don't recall the year.  
 18 Q. Do you recall approximately  
 19 when?  
 20 A. No.  
 21 Q. Do you recall how you became  
 22 aware of Walmart's obligations to monitor  
 23 orders for Schedule II narcotics?  
 24 A. No. No, not -- no.  
 25 Q. So I just want to make sure

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1 that the record is clear. So you don't  
 2 recall either how you became aware or when  
 3 you became aware of Walmart's obligations to  
 4 monitor orders of Schedule II narcotics; is  
 5 that correct?  
 6 MS. FUMERTON: Objection.  
 7 Form.  
 8 THE WITNESS: I don't recall.  
 9 QUESTIONS BY MR. BOWER:  
 10 Q. And what about Walmart's  
 11 obligations to monitor orders of Schedule III  
 12 narcotics, do you know whether they have any  
 13 such obligations?  
 14 MS. FUMERTON: Objection.  
 15 Form.  
 16 QUESTIONS BY MR. BOWER:  
 17 Q. I'll strike that.  
 18 Do you know whether Walmart has  
 19 any obligations to monitor orders of  
 20 Schedule III narcotics?  
 21 MS. FUMERTON: Objection.  
 22 Form.  
 23 THE WITNESS: Ask the question  
 24 again.  
 25

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1 QUESTIONS BY MR. BOWER:  
 2 Q. Sure.  
 3 Do you know whether Walmart, as  
 4 a distributor, has any obligations to monitor  
 5 orders placed by its pharmacies for  
 6 Schedule III narcotics?  
 7 MS. FUMERTON: Objection.  
 8 Form.  
 9 Can we get a time period?  
 10 MR. BOWER: At any point.  
 11 MS. FUMERTON: Okay.  
 12 MR. BOWER: Just a question.  
 13 MS. FUMERTON: It's a question  
 14 with a false premise, though. That's  
 15 the problem. You're talking about as  
 16 a distributor, and as you know,  
 17 Walmart no longer distributes  
 18 controlled substances.  
 19 MR. BOWER: Okay.  
 20 QUESTIONS BY MR. BOWER:  
 21 Q. Do you know whether Walmart --  
 22 MS. FUMERTON: You said  
 23 "Walmart, as a distributor." That's  
 24 why I'm asking, why the question is  
 25 flawed.

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1 MR. BOWER: Okay. I'll  
 2 rephrase the question. I think you  
 3 understood it, but I'll rephrase.  
 4 QUESTIONS BY MR. BOWER:  
 5 Q. Do you know whether Walmart at  
 6 any point had any obligation to monitor  
 7 orders for Schedule II narcotics that were  
 8 placed by its pharmacy to its distribution  
 9 centers?  
 10 A. Yes.  
 11 Q. Okay. What is your  
 12 understanding of those obligations?  
 13 A. I don't have an understanding  
 14 of it. I know that there was policies or  
 15 procedures related to that. That wasn't part  
 16 of my responsibility.  
 17 Q. Has it ever been part of your  
 18 responsibility?  
 19 A. No. No.  
 20 Q. Have you ever had any role  
 21 since you started working at Walmart in  
 22 connection with Walmart's suspicious order  
 23 monitoring program?  
 24 MS. FUMERTON: Objection.  
 25 Form.

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1 THE WITNESS: I was part of the  
2 rollout of that system.  
3 QUESTIONS BY MR. BOWER:  
4 Q. And when did that occur?  
5 A. I don't recall.  
6 Q. Approximately?  
7 A. The Reddwerks threshold, I  
8 believe, was 2010, 2011.  
9 Q. And we'll look at some  
10 documents in a bit. Maybe that'll help you  
11 refresh your recollection. I'm just trying  
12 to get a general sense of when you say  
13 "rollout of that system," are you referring  
14 to the over 20 reports or something else?  
15 A. No, that would have -- I don't  
16 know if that was during the same time.  
17 Q. Okay. So when you say "rollout  
18 of that system," what system are you  
19 referring to?  
20 A. The thresholds.  
21 Q. What do you mean by --  
22 A. Order alert.  
23 Q. What do you mean by thresholds?  
24 Order alerts?  
25 A. That's what the project was

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1 called.  
2 Q. What project are you referring  
3 to?  
4 A. So the rollout of Reddwerks  
5 order alert.  
6 Q. And you believe that occurred  
7 sometime in 2010; is that correct?  
8 A. '10 or '11. I don't recall.  
9 Q. Before that rollout occurred,  
10 did Walmart have a monitoring program in  
11 place?  
12 A. Yes.  
13 Q. And what was that program?  
14 A. I believe it was a 405 report,  
15 and they monitored orders as they came in.  
16 Q. Okay. And what do you mean  
17 by -- when you say "they monitored orders as  
18 they came in," what does that mean?  
19 A. So the distribution center did  
20 and the associates did.  
21 Q. Are the associates at the  
22 distribution center?  
23 A. Yes.  
24 Q. Okay. Anyone other than the  
25 associates at the distribution center that

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1 would monitor orders?  
2 MS. FUMERTON: Objection.  
3 Form.  
4 QUESTIONS BY MR. BOWER:  
5 Q. And I'm just trying -- just so  
6 the record is clear, I'm just trying to  
7 understand your answer.  
8 You said "the distribution  
9 center did and the associates did." Are  
10 those two different things in your mind?  
11 A. They're all at the distribution  
12 center.  
13 Q. And what were the associates  
14 doing prior to the rollout of Reddwerks?  
15 A. So my understanding is that  
16 they would -- they would let their manager  
17 know if they saw an order that was out of the  
18 ordinary.  
19 Q. What do you mean by "out of the  
20 ordinary"?  
21 A. Like, for example, ReliOn  
22 insulin, we had orders that would -- where  
23 the pharmacy would think that they were  
24 ordering ten vials of insulin, and they  
25 actually ordered a hundred of them because

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1 they were in packs of ten. So those would be  
2 examples of what they would bring to their  
3 attention.  
4 Q. And in fact, Walmart had an  
5 automatic cut for those instant orders,  
6 correct?  
7 MS. FUMERTON: Objection.  
8 Form.  
9 Go ahead.  
10 THE WITNESS: For the what now?  
11 QUESTIONS BY MR. BOWER:  
12 Q. For those insulin orders that  
13 you just -- the example that you just  
14 provided, Walmart actually had an automatic  
15 cut for those orders, didn't they?  
16 MS. FUMERTON: Objection.  
17 Form.  
18 THE WITNESS: It was a manual  
19 cut; it wasn't automatic.  
20 QUESTIONS BY MR. BOWER:  
21 Q. A manual cut that was  
22 automatically applied to insulin orders,  
23 correct?  
24 MS. FUMERTON: Objection.  
25 Form.

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1 THE WITNESS: They would call  
 2 the store to inform them that they had  
 3 placed -- if they really wanted a  
 4 hundred because, I mean, the  
 5 refrigerator didn't hold a hundred.  
 6 QUESTIONS BY MR. BOWER:  
 7 Q. Right.  
 8 And that was specific to  
 9 insulin, correct?  
 10 A. That's correct.  
 11 Q. Okay. What about with respect  
 12 to Schedule II narcotics, what were the DCs  
 13 doing in 2008?  
 14 MS. FUMERTON: Objection.  
 15 Form.  
 16 THE WITNESS: My understanding  
 17 is they would do the same thing with  
 18 that.  
 19 QUESTIONS BY MR. BOWER:  
 20 Q. And where does that  
 21 understanding come from?  
 22 A. Just from when I was training  
 23 in 2008, when I was out at the DCs training.  
 24 Q. Okay. So what specifically did  
 25 you learn in connection with your training

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1 that the DCs were doing for Schedule II  
 2 narcotics?  
 3 MS. FUMERTON: Objection.  
 4 Form.  
 5 THE WITNESS: So again, they  
 6 would look at that paper and let their  
 7 supervisor or manager know that this  
 8 appears to be out of the ordinary or  
 9 unusual.  
 10 QUESTIONS BY MR. BOWER:  
 11 Q. And at that point -- and we're  
 12 talking 2008, correct?  
 13 A. Yes.  
 14 Q. At that point, how was DC 6045  
 15 receiving orders? They were paper, correct?  
 16 A. So those would come in  
 17 electronically. They're printed on paper.  
 18 Q. They would come in  
 19 electronically once a day?  
 20 A. That's correct.  
 21 Q. And then they would print it on  
 22 paper at the DC?  
 23 A. That's correct.  
 24 Q. And then what would happen to  
 25 those papers?

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1 A. Well, first they would print  
 2 the 222 form, sign those, and then that and  
 3 the paper order would be put together in a  
 4 packet, and the associates would fill orders  
 5 based on that paper order.  
 6 Q. And was it the practice for the  
 7 orders to be filled and shipped the same day  
 8 they came in?  
 9 A. Yes.  
 10 Q. And approximately how many  
 11 orders came in to DC 6045 on a daily basis  
 12 during this time period?  
 13 A. I don't recall how many orders  
 14 came in.  
 15 Q. Would it have been in the  
 16 hundreds of orders? Could it have been in  
 17 the hundreds of orders per day?  
 18 A. Well, they filled store  
 19 order -- store only got an order once a week  
 20 of C-IIs. So if you divide it up, however  
 21 many stores we had at the time, that's how  
 22 many orders they would -- processed, four  
 23 days a week.  
 24 Q. That's fine.  
 25 You said four days a week?

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1 A. Yes.  
 2 Q. So, for example, if there were  
 3 4,000 stores, approximately a thousand orders  
 4 a day, correct?  
 5 A. Potentially.  
 6 Q. And just so the record's clear,  
 7 you mentioned a couple reports. I just want  
 8 to go through just what those reports are.  
 9 What is a 222?  
 10 A. It's a DEA 222 form to move  
 11 C-II drugs.  
 12 Q. Okay. And what is a 405  
 13 report?  
 14 A. So it was a report that the  
 15 distribution used. I don't know what they --  
 16 I don't know what all it had on there. I  
 17 know that they used it.  
 18 Q. And how do you know that they  
 19 used it?  
 20 A. Because when it didn't generate  
 21 one month, they pinged me to help them get it  
 22 generated.  
 23 Q. Do you know why they pinged you  
 24 to help get them generated?  
 25 A. Because of the systems

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1 background that I had.  
 2 Q. And what systems backgrounds do  
 3 you have?  
 4 A. It was mainly knowing how the  
 5 orders would come in, some of the jobs that  
 6 were run for certain reports. So I would  
 7 partner with maybe my -- I had contacts over  
 8 in the IT department, so they would ask me to  
 9 ping somebody over in IT to let them know  
 10 that a report didn't run.  
 11 Q. And I just want to put a time  
 12 frame on that answer.  
 13 What time frame would you ping  
 14 folks in IT to run a report?  
 15 MS. FUMERTON: Objection.  
 16 Form.  
 17 THE WITNESS: That happened to  
 18 be one incident. I don't know when it  
 19 occurred.  
 20 QUESTIONS BY MR. BOWER:  
 21 Q. Okay. Other than the 405  
 22 reports and the DC associates reviewing the  
 23 orders, prior to the role of Reddwerks, was  
 24 Walmart doing anything else to review orders  
 25 for Schedule II narcotics?

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1 MS. FUMERTON: Objection.  
 2 Form.  
 3 THE WITNESS: I don't know.  
 4 QUESTIONS BY MR. BOWER:  
 5 Q. Anything else that you're aware  
 6 of that was being done?  
 7 MS. FUMERTON: Objection.  
 8 Form.  
 9 THE WITNESS: I don't know.  
 10 QUESTIONS BY MR. BOWER:  
 11 Q. Well, you visited DC 6045 in  
 12 2008, correct?  
 13 A. I did.  
 14 Q. Okay. At that point did you  
 15 see anything else being done in connection  
 16 with reviewing orders placed by the  
 17 pharmacies for Schedule II narcotics?  
 18 MS. FUMERTON: Objection.  
 19 Form.  
 20 THE WITNESS: Not that I  
 21 recall.  
 22 QUESTIONS BY MR. BOWER:  
 23 Q. Okay. And did someone at DC  
 24 6045 tell you that they would have the  
 25 associates review the orders on a daily

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1 basis?  
 2 A. That was part of the training  
 3 that -- when I was learning how to -- they  
 4 filled orders. They told me and so did the  
 5 associates.  
 6 Q. Okay. So who told you that?  
 7 A. I don't recall the manager that  
 8 would have said it.  
 9 Q. Was it the manager at 6045 or  
 10 your manager for the training?  
 11 A. No, it was the managers that  
 12 were supervisors at 6045.  
 13 Q. Mike Mullin?  
 14 A. He was a general manager. I  
 15 don't know.  
 16 Q. Okay. Do you know who had  
 17 responsibility at 6045 for making sure the  
 18 associates would review the orders for  
 19 Schedule II narcotics?  
 20 A. I don't know.  
 21 Q. Are you aware of any instance  
 22 where the associates flagged an order for  
 23 Schedule II narcotics as potentially  
 24 suspicious?  
 25 MS. FUMERTON: Objection.

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1 Form.  
 2 THE WITNESS: I don't know.  
 3 QUESTIONS BY MR. BOWER:  
 4 Q. Was that part of your training?  
 5 A. I spent a day there. I --  
 6 doing the order filling process. That day we  
 7 didn't. I don't know of anything else that  
 8 would have been done.  
 9 Q. What about since that day?  
 10 MS. FUMERTON: Objection.  
 11 Form.  
 12 THE WITNESS: I don't know. It  
 13 wouldn't have been anything that would  
 14 have come to me.  
 15 QUESTIONS BY MR. BOWER:  
 16 Q. So in 2008 you're tagged with  
 17 responsibility to bring in a system to kind  
 18 of move beyond this printout and paper  
 19 system, correct?  
 20 A. Correct.  
 21 Q. Okay. And what did you do in  
 22 connection with those responsibilities?  
 23 A. I looked at multiple order  
 24 filling vendors. I brought those vendors to  
 25 my boss at the time, and then they made a



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1 decision on which vendor to go with.  
 2 Q. And who was your boss at the  
 3 time?  
 4 A. So in 2008 it was Molly Mason.  
 5 Q. And which vendor did you end up  
 6 going with?  
 7 A. Reddwerks.  
 8 Q. And do you recall why you chose  
 9 Reddwerks?  
 10 A. They had -- they were the only  
 11 vendor that had a continuous light.  
 12 Q. And what do you mean by a  
 13 continuous light?  
 14 A. So the bar in front of the  
 15 product, it was all lights versus just one  
 16 light.  
 17 Q. And was that something that was  
 18 important to Walmart?  
 19 A. It was important, yes.  
 20 Q. And why is that?  
 21 A. So that you wouldn't have to  
 22 have openings if the product -- for that  
 23 location, the size changed, you wouldn't have  
 24 to go get maintenance to cut you another  
 25 plate to move the light over. So then you

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1 could dedicate light space for that product,  
 2 and if that product moved somewhere else in a  
 3 different bay, then -- running a smaller  
 4 product, then you didn't have to, again, cut  
 5 the plate and change the backing of it.  
 6 Q. Did Walmart's decision to go  
 7 with Reddwerks impact the ordering process  
 8 for Schedule II narcotics?  
 9 MS. FUMERTON: Objection.  
 10 Form.  
 11 THE WITNESS: No.  
 12 QUESTIONS BY MR. BOWER:  
 13 Q. Those orders still came in to  
 14 6045, correct?  
 15 A. Correct.  
 16 Q. They were still printed out on  
 17 paper on a daily basis?  
 18 A. They printed the 222 form.  
 19 Q. Okay. Well, let's go back then  
 20 to before you went with Reddwerks.  
 21 A. Uh-huh.  
 22 Q. How was Walmart filling orders  
 23 for Schedule II products at 6045?  
 24 MS. FUMERTON: Objection.  
 25 Form.

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1 MR. BOWER: What's the nature  
 2 of that objection?  
 3 MS. FUMERTON: It's an  
 4 incredibly broad and vague question.  
 5 QUESTIONS BY MR. BOWER:  
 6 Q. Okay. You can answer.  
 7 A. So in 2008, they printed the  
 8 222 forms, and they printed the paper orders.  
 9 Q. And what would they do with  
 10 those paper orders that they printed?  
 11 A. They would fill the order from  
 12 the paper.  
 13 Q. Did that process change after  
 14 Walmart adopted the Reddwerks system?  
 15 A. The -- I don't know how to  
 16 answer that because it's -- the fill process  
 17 still was the same. I was still getting  
 18 order at the DC. I'd still sign my 222,  
 19 just -- I don't print paper. It goes to a  
 20 light.  
 21 Q. Okay. You mentioned the light  
 22 term a couple times.  
 23 What do you mean by "light"?  
 24 It may not be familiar to some  
 25 of us that aren't in the industry.

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1 A. So it truly is a bar of lights,  
 2 and the light will light up with the quantity  
 3 that you need to pick for that product.  
 4 Q. So there's an associate  
 5 assigned to each product; is that correct?  
 6 A. There's an associate  
 7 assigned...  
 8 MS. FUMERTON: Go ahead.  
 9 Sorry. I was going to give an  
 10 objection. Go ahead.  
 11 THE WITNESS: There's an  
 12 associate assigned multiple products.  
 13 QUESTIONS BY MR. BOWER:  
 14 Q. And the light informs the  
 15 associate of how much of that product is  
 16 necessary for a particular order; is that  
 17 correct?  
 18 A. That's correct.  
 19 Q. And how does the light do that?  
 20 A. It's the same thing that went  
 21 to the paper that goes to the light.  
 22 Q. Is the light a screen?  
 23 A. Is the light a screen?  
 24 Q. Yeah.  
 25 How does the light convey that

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1 information to an associate? Is it a number  
 2 on a screen? Is it --  
 3 A. Yes, it's a number on a screen.  
 4 Q. And does that number on the  
 5 screen reflect a product number?  
 6 MS. FUMERTON: Objection.  
 7 Form.  
 8 QUESTIONS BY MR. BOWER:  
 9 Q. All right. I'll strike that.  
 10 The associate's assigned more  
 11 than one product, correct?  
 12 A. Correct.  
 13 Q. How does the associate know how  
 14 many of each product to fill?  
 15 A. There's just -- the light in  
 16 front of that product tells them. So there's  
 17 a screen there that says "pick one" or  
 18 whatever.  
 19 Q. Okay. And that process applied  
 20 to order filling at 6045 for Schedule II  
 21 products; is that correct?  
 22 A. It occurred for all buildings.  
 23 Q. And when was that process  
 24 implemented at 6045?  
 25 A. I don't know exactly when it

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1 was implemented in 6045, but we started the  
 2 project in 2009.  
 3 Q. Do you know whether the  
 4 implementation of Reddwerks impacted  
 5 Walmart's suspicious order monitoring program  
 6 at all?  
 7 MS. FUMERTON: Objection.  
 8 Form.  
 9 THE WITNESS: I have no idea.  
 10 QUESTIONS BY MR. BOWER:  
 11 Q. You don't know one way or the  
 12 other, correct?  
 13 A. I have no idea.  
 14 MS. FUMERTON: Zach, we've been  
 15 going for about an hour. Would it be  
 16 okay --  
 17 MR. BOWER: Can we just have a  
 18 few minutes just to round out her  
 19 employment history and then we'll --  
 20 MS. FUMERTON: Sure.  
 21 MR. BOWER: I just wanted -- so  
 22 we can switch topics after the break.  
 23 QUESTIONS BY MR. BOWER:  
 24 Q. So you held this position  
 25 beginning in 2008 where you were senior

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1 manager for the pharmacy team.  
 2 How long did you hold that  
 3 position?  
 4 A. That's what I currently do.  
 5 Q. You still have that -- what's  
 6 your current title?  
 7 A. Senior manager, department  
 8 supply chain. We just changed it from  
 9 logistics to supply chain.  
 10 MR. BOWER: It might take a  
 11 little longer to go through subsequent  
 12 duties and responsibilities, so why  
 13 don't we take a break and we can  
 14 finish up after.  
 15 MS. FUMERTON: Okay.  
 16 VIDEOGRAPHER: Going off the  
 17 record at 8:33 a.m.  
 18 (Off the record at 8:33 a.m.)  
 19 VIDEOGRAPHER: We're back on  
 20 the record at 8:47 a.m.  
 21 QUESTIONS BY MR. BOWER:  
 22 Q. Okay. I just want to finish  
 23 up, hopefully fairly briefly, your roles at  
 24 Walmart.  
 25 So from 2008 to the present,

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1 you've had the same title, essentially; is  
 2 that correct?  
 3 A. That's correct.  
 4 Q. Okay. Other than the system  
 5 implementation of Reddwerks that we've  
 6 discussed, what have your other duties and  
 7 responsibilities been since 2008 in that  
 8 title?  
 9 A. So it's mostly been systems,  
 10 system enhancements, the rollout of CSOS,  
 11 some other day-to-day stuff that comes up.  
 12 Q. Other than the rollout of CSOS,  
 13 which stands for controlled substance  
 14 ordering system -- is that correct?  
 15 A. That's correct.  
 16 Q. What other systems enhancements  
 17 did you work on?  
 18 A. So we did the order level  
 19 alerts for Reddwerks. And then we did an  
 20 enhancement to that later on.  
 21 Q. And do you have any  
 22 understanding as to why Walmart imposed an  
 23 order level alert for Reddwerks?  
 24 MS. FUMERTON: Objection.  
 25 Form.